

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

Jointly Administered

Re: Docket Nos. 16, 82 and 108

Hearing Date: July 27, 2023, at 9:30 a.m. (Eastern)

KARMA AUTOMOTIVE LLC'S WITNESS LIST AND EXHIBIT LIST FOR HEARING

Karma Automotive LLC ("**Karma**") by and through its counsel, Seyfarth Shaw LLP and Chipman Brown Cicero & Cole, LLP, hereby submits the enclosed witness and exhibit list for the hearing scheduled for July 27, 2023, at 9:30 a.m. (Eastern Time) in connection with (i) *Karma Automotive LLC's Motion for Relief from the Automatic Stay* [[Docket No. 82](#)]; (ii) *Debtors' Motion for Entry of Orders (I) Establishing Procedures and Schedule for Estimation Proceedings and (II) Estimation of the Amount of the Claim Held by Karma Automotive LLC* [[Docket No. 108](#)]; and (iii) *Debtors' Motion for Entry of an Order (I) (A) Establishing Bidding and Auction Procedures, (B) Scheduling Certain Dates With Respect Thereto, (C) Approving the Form and Manner of Notice Thereof, (D) Approving Contract Assumption and Assignment Procedures, and (E) Granting Other Related Relief; and (II) (A) Authorizing Debtors to Enter Into a Definitive Purchase Agreement and (B) Granting Other Related Relief* [[Docket No. 16](#)] and any objections, responses or replies filed thereto.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

Karma reserved the right to call any witness listed by any other party, to call additional witnesses as rebuttal witnesses, request that the Court take judicial notice of any document filed in these cases or publicly available, and to use any exhibits presented by any other party.

Karma also reserves the right to use exhibits not listed here for impeachment or rebuttal purposes at the hearing. Karma further reserves the right to supplement or amend this Witness and Exhibit List at any time prior to the hearing.

Karma's Witness List:

Name	Title
Michael D. Wexler	Partner at Seyfarth Shaw LLP

Karma's Exhibit List:

Exhibit No.	Description
1.	<i>Declaration of Michael D. Wexler in Support of Motion for Relief from the Automatic Stay</i> [Docket No. 83].
2.	First Amended Complaint in District Court Case dated April 20, 2023 (<i>Unredacted - Confidential</i>) [District Court Docket No. 72]
3.	LMC00166061 – Post Email to Woods RE Durre dated 8/6/2020 (<i>Confidential</i>)
4.	LMC00180201 – Text Messages between Durre and Post dated 8/7/2020 (<i>Confidential</i>)
5.	LMC00180236 – Text Message between Durre and Post dated 7/28/2020 (<i>Confidential</i>)
6.	District Court Case Order Regarding Motion for Preliminary Injunction and Sanctions, dated September 16, 2022 [District Court Docket No. 159]
7.	District Court Case Order Regarding [Second] Motion for Sanctions, dated February 18, 2022 (<i>Confidential</i>) [District Court Docket No. 189]
8.	District Court Case Order re: Motions <i>in Limine</i> , dated December 12, 2022 [District Court Docket No. 439]
9.	District Court Case Order Regarding Defendants' <i>Ex Parte</i> Application to Vacate April 11, 2023 Trial Date, dated March 13, 2023 [District Court Docket No. 510]

10	Karma's Response in Opposition to Defendants' Motion for Summary Judgment in District Court Case (<i>Confidential – Unredacted</i>) [District Court Docket No. 285-1]
11.	Order Regarding Motion for Summary Judgment (<i>Confidential</i>) [District Court Docket No. 429]
12.	Final Pretrial Order in District Court Case dated December 13, 2022 [District Court Docket No. 437]

Dated: July 25, 2023
Wilmington, Delaware

Respectfully submitted,

CHIPMAN BROWN CICERO & COLE, LLP

/s/ William E. Chipman, Jr.

William E. Chipman, Jr. (No. 3818)

Mark D. Olivere (No. 4291)

Hercules Plaza

1313 North Market Street Suite 5400

Wilmington, DE 19801

Telephone: (302) 295-0191

Email: chipman@chipmanbrown.com

olivere@chipmanbrown.com

-and-

SEYFARTH SHAW LLP

Michael D. Wexler (admitted *pro hac vice*)

James B. Sowka (admitted *pro hac vice*)

233 South Wacker Drive, Suite 8000

Chicago, IL 60606-6448

Telephone: (312) 460-5000

Email: mwexler@seyfarth.com

jsowka@seyfarth.com

Jesse M. Coleman (admitted *pro hac vice*)

700 Milam Street, Suite 1400

Houston, TX 77002-2797

Telephone: (713) 225-2300

Email: jcoleman@seyfarth.com

Counsel for Karma Automotive, LLC